

EXHIBIT 1

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

Wray, et al. v. Ameridose, LLC, et al.
Civil Action Number 1:13-cv-12737-RWZ

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) MDL No. 2419
) Dkt. No. 1:13-md-2419 (RWZ)
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NOTICE OF DEPOSITION

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure and MDL Order No. 10 (Document #1426) the Plaintiffs' Steering Committee will take the deposition of Vaughan Allen, M.D. on April 19, 2016 at 4:00 p.m. at Gideon, Cooper & Essary PLC, 315 Deaderick Street, Suite 1100, Nashville, Tennessee 37238. The deposition will be recorded by stenographical means and by video.

Dated: March 21, 2016

Respectfully submitted,

s/ Mark P. Chalos

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*Plaintiffs' Steering Committee and Federal/State
Liaison*

CERTIFICATE OF SERVICE

I, Mark P. Chalos, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: March 21, 2016

s/ Mark P. Chalos
Mark P. Chalos

EXHIBIT A

The word “documents” shall be defined to include any kind of written, typewritten, printed or recorded material whatsoever, including without limitation, statements, notes, transcription of notes, memoranda, letters, telefaxes, publications, agreements, pictures, photographs, audio tape recordings, video tape recordings, cassettes, transcriptions of any such recordings, log books, business records, and computer files or electronic data such as e-mails or instant messages.

Pursuant to the Federal Rules of Civil Procedure, this will serve as a request for the Deponent, Vaughan Allen, M.D., to produce the following documents at least seven days before the deposition:

1. All medical records for Jane Wray.
2. All documents collected by you or your counsel from the releases provided by Jane Wray with her plaintiff profile form in this litigation.